

Docket No.: 3350-04  
Client No.:



#19

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

RECEIVED

In re Application of :  
GARRISON et al. :  
: Group Art Unit: 2765  
Application No.:09/010,193 :  
: Examiner: Romain Jeanty  
Filed: January 21, 1998 :  
: For: DUAL SOURCE REMITTANCE PROCESSING

SEP 05 2000

Group 2700

**APPEAL BRIEF**

Honorable Assistant  
Commissioner  
for Patents  
Washington, DC 20231

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Commissioner for Patents,  
Washington, D.C. 20231

on August 29, 2000.....  
Lisa E. Daffert.....  
Signature

Sir:

This Appeal Brief is submitted in support of the Notice of  
Appeal filed June 29, 2000.

**I. REAL PARTY IN INTEREST**

CheckFree Corporation is the real party in interest.

**II. RELATED APPEALS AND INTERFERENCES**

NONE

**III. STATUS OF CLAIMS**

Claims 1-7, 11, 13-15, 19-31 and 35-50 are pending. Each of  
claims 1-7, 11, 13-15, 19-31 and 35-50 is under appeal.

#### **IV. STATUS OF AMENDMENTS**

Amendments were filed on November 18, 1999 and May 30, 2000. A Request for Reconsideration was filed on April 25, 2000. The Amendment filed on November 18, 1999 has been entered.

#### **V. SUMMARY OF INVENTION**

The present application is directed to a technique for receiving respective sets of payment requests of multiple payors from a plurality of different independent sources (page 9, lines 16-19). Each source transmits a different set of payment requests to the service provider (page 16, lines 15 and 16), which then processes these requests to direct payments to the applicable payees.

The invention, as recited in claim 1, and with reference to Figures 1, 2A and 2B, electronically processes bill payment requests. As described on pages 9-11 and in the preferred embodiment description on page 15, line 8, through page 19, line 5, respective sets of payment requests are received electronically (for example via input port 10) from a plurality of independent sources (for example from source systems 7A-C). Each set of payment requests corresponds to an associated set of payors (for example consumers represented by consumer systems A1-AN, B1-BM, and C1-CP) requesting payments to a plurality of payees (for example merchants represented by merchant systems 4). The payment requests are processed at a single remittance processing system (for example the remittance payment processor (RPP) 3) having a database (for example the merchant database 18)

including payee information for each of the plurality of payees (for example merchants represented by merchant systems 4). The processing (for example by RPP 3) generates payment directions for paying the plurality of payees (for example merchants represented by merchant systems 4) in accordance with the processed payment requests.

As recited in claim 2 and described in the context of preferred embodiment on page 17, lines 9-18, a first of the respective sets of payment requests (for example from one of the source systems 7A-C) may be received in a first format, while a second of the respective sets of payment requests (for example from another of the source systems 7A-C) may be received in a second format, different from the first format. In such a case, processing (for example by the RPP 3) includes normalizing the first and the second respective payment requests to correspond to a third format and generating the payment directions based upon the normalized first and second respective payment requests.

As recited in claim 3, a first of the respective sets of payment requests may be received in a first format, and normalized to correspond to a normalized format. If so, the payment directions are generated based upon the normalized requests.

As required by claim 4, and described in relation to the preferred embodiment on page 16, lines 16-19, each of the respective sets of payment requests from payors (for example from those consumers represented by the set of consumer systems A1-AN, or B1-BM, or C1-CP) may be received (for example from the

applicable source system 7A, or 7B or 7C) as a batch file.

As required by claim 5, and disclosed in relation to the preferred embodiment on page 18, lines 17-20, one of electronically crediting a bank account of the payee and generating a check or draft payable to the payee may be performed (for example by the payment processor 25) in accordance with the payment directions.

As required by claim 6 and described in connection with the preferred embodiment on page 19, lines 12-14, respective payment advice for each of the plurality of payees (for example each of the merchants represented by merchant systems 4) may be generated (for example by the payment processing system 25) in accordance with the payment directions (for example from the RPP 3). The payment advice may be electronically transmitted to each of the plurality of payees (for example each of the merchants represented by merchant systems 4).

As recited in claim 7 and discussed in the context of the preferred embodiment on page 22, line 5, through page 25, line 16 with reference to Figures 3-4, each of the received payment requests (for example a payment request of one of the consumers represented in the set of consumer systems A1-AN, or B1-BM, or C1-CP received from the applicable source system 7A, or 7B or 7C by the RPP 3) may include payor payment information including at least one of a name, a street address, a city and state, and a first zip code of the payee (for example one of the merchants represented by merchant systems 4) to be paid. At least a portion of the payor payment information, other than any received

first zip code, is processed (for example by the RPP processor 17) to identify an eleven digit zip code for the payee (for example one of the merchants represented by merchant systems 4) to be paid. The database (for example the RPP merchant database 18) is accessed to locate the payee information corresponding to the eleven digit zip code.

According to claim 11 and discussed in the context of the preferred embodiment on page 25, line 17, through page 28, line 2 with reference to Figure 5, a first of the plurality of payees (for example one of the merchants represented by merchant systems 4) may have a plurality of payment remittance centers and a first of the payment requests may include information identifying a payor account number with the first payee (for example an account number of one of the consumers represented in the set of consumer systems A1-AN, or B1-BM, or C1-CP whose request was received from the applicable source system 7A, or 7B or 7C by the RPP 3). One or more alphanumeric characters in the account number may be identified and one of the plurality of remittance centers may be selected based upon the identified alphanumeric characters (for example by the RPP 3). Payment is directed to the one remittance center (for example also by the RPP 3).

As recited in claim 13 and described in the context of the preferred embodiment on page 28, line 3, through page 31, line 5, with reference to Figure 6, each of the payment requests (for example the payment requests of each of the consumers represented in the set of consumer systems A1-AN, or B1-BM, or C1-CP whose request is received from the applicable source system

7A, or 7B or 7C by the RPP 3) includes a payor's account number with a payee (for example one of the merchants represented by merchant systems 4). The alteration rules corresponding to a payee account number format are stored (for example in the RPP merchant database 18). The account number included in one of the payment requests is transformed (for example in the RPP processor 17) into an altered account number including a portion of at least one of a payor's name, a payor's street address and a payor's zip code according to the alteration rules.

As recited in claim 14, the altered account number of claim 13 may be transmitted to the payee (for example the applicable merchant represented by merchant systems 4) to notify the payee of a payment based on the payment directions.

As recited in claim 15 validation rules corresponding to payee values for fields of the account number may be stored (for example in the RPP merchant database 18), and a determination can be made (for example by the RPP processor 17) if the received account number conforms with the validation rules.

As recited in Claim 35 and with reference to the preferred embodiment described with reference to Figures 1, 2A and 2B, a system for processing payment information, includes one or more networks (for example the network of Figure 1 or the networks 1A-1C and 1D-1E shown in Figure 2A). A plurality of source stations (for example source systems 7A-7C) are coupled to the one or more networks. Each source station is configured to collect respective payment requests from a plurality of payors (for example each of the consumers represented by the set of consumer

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systems A1-AN in the case of source system 7A, each of the consumers represented by the set of consumer systems B1-BM in the case of source system 7B, and each of the consumers represented by the set of consumer systems C1-CP in the case of source system 7C) for payment of a plurality of payees (for example the merchants represented by merchant systems 4). Each request contains payment information, including a payee name, payee address data, and a payor account number with a payee. A centralized remittance station (for example in the RPP 3) is coupled to the one or more networks, and configured to receive the respective sets of payment requests from the plurality of source stations (for example source systems 7A-7C) via at least one of the one or more networks, and process the payment information to generate payment directions for paying the plurality of payees (for example the merchants represented by merchant systems 4) in accordance with the processed payment information.

In view of the above, a further description of the elements of the system claims 19-31 and 36-40 and software claims 41-50 is considered to be unnecessary.

## **VI. ISSUES**

Whether claims 1-7, 11, 13-15, 19-31 and 35-50 are obvious under 35 USC § 103(a) over Kight et. al. (U.S. Patent No. 5,383,113) in view of Pintsov et. al. (U.S. Patent No. 5,612,889).

**VII. BRIEF DESCRIPTION OF THE REFERENCES**

Kight et. al. (U.S. Patent No. 5,383,113), which is commonly assigned to the assignee of all rights in the present application, discloses a system (shown in Figure 1) which allows an individual consumer (payor) to direct payment of a plurality of the consumer's bills through a service provider (column 3, line 55, through column 4, line 2). The system, including elements 40, 46, and 50, is accessed directly by the individual consumer via a remote communications device 35 or 37 (column 3, line 67, through column 4, line 2). Once connection with the system has been established, the consumer directs the system to make payments to individual payees (column 3, lines 57-59). Payment directions for paying payees are generated in accordance with payment requests (column 4, lines 42-56). Kight ensures that payments to payees are in a proper payment format (column 3, line 39). In a described service initiation process, the individual consumer prepares and directly files a form with the service provider which provides the necessary information relating to that consumer (column 2, lines 38-53). Thus, Kight discloses that each individual payor directs the payment of his/her bills from different payees by transmitting payment requests directly to the service provider. That is, the service provider receives payment requests from each payee separate from the requests received from other payees.

Pintsov et. al. (U.S. Patent No. 5,612,889) discloses a mail system for securely protecting payment to the carrier service by insuring that the carrier service authorizes mail prior to its



actual deposit into the postal stream. As described in column 12, line 51, through column 13, line 30, and shown in Figures 6 and 10, each mail piece is marked with a mail piece ID 306 other than the zip code, which is used in the authorization process. The unique mail piece ID is used to access the correct mailing identification file to retrieve the extended zip code. The zip code is then printed on the mail piece as indicated by 1002. The stored zip code may be altered due to an address change (column 7, lines 49-56, column 10, lines 61-65, column 11, lines 56-67 and column 12, lines 1-4). The zip code is used to identify the delivery point to which delivery is directed (column 11, lines 39-51). Information is processed to debit the mailer's account and a mailing ID file is sent to the mailer after the debiting of the mailer's account (column 10, lines 54-55).

#### **VIII. THE REJECTION**

In the Final Official Action dated February 29, 2000, pending claims 1-7, 11, 13-15, 19-31, and 35-50 stand rejected under 35 USC § 103(a) as obvious over Kight et. al. (U.S. Patent No. 5,383,113) in view of Pintsov et. al. (U.S. Patent No. 5,612,889).

The Examiner relies on Kight as disclosing, in column 2, lines 38-53, the receipt of respective sets of payment requests, as recited in each of independent claims 1, 19, 35, 41 and 50 and hence required by all claims of the subject application.

In an Advisory Action dated May 12, 2000, in answer to the Request for Reconsideration filed on April 25, 2000, the Examiner

further relies on Kight's disclosure in column 4, lines 42-52 in support of this position.

During the Examiner Interview of May 30, 2000, requested in view of the Advisory Action, Applicants' representatives argued (consistent with arguments made in previously filed responses to the prior Official Actions) that Kight failed to disclose the receipt of a set of payment requests. Rather Kight disclosed only the receipt of an individual payment request from an individual consumer. As understood by Applicants' representatives in attendance at the Examiner Interview, the Examiner and Primary Examiner in attendance conceded this point, but requested that the existing claim recitals be clarified in this regard by an after final amendment changing the recited "sets of payment requests" to --sets of consolidated payment requests--. Applicants' representatives agreed, as explicitly documented in the Interview Summary. As also explicitly indicated in the Interview Summary, it was agreed that the Examiner would perform a further search to determine if more relevant art could be applied before allowing the case to issue.

An After Final Amendment was filed on May 30, 2000 consistent with the agreement reached during the Examiner Interview.

However, contrary to the agreement reached during the Interview of May 30, 2000, and clearly evidenced by the Interview Summary, a further Advisory Action issued on June 14, 2000, denying entry of the After Final Amendment on the basis that "consolidation" was not recited in the previously presented

claims, and maintaining the rejection set forth in the Final Official Action. In this Advisory Action the Examiner also makes of record by does not apply a further reference.

In the Final Official Action, the Examiner relies on Pintsov (column 7, lines 49-56) as disclosing the generation of payment directions for paying a plurality of payees, as recited in each of independent claims 1, 19, 35, 41 and 50 and hence required by all claims of the subject application.

With regard to claims 2, 3, 21, and 42-43, which require that differently formatted sets of payment request be normalized, the Examiner relies on Kight description in (Col. 3, line 39) as corresponding to the recited limitations.

Regarding claims 7-10, 25-27, 36-38 and 47, which require that payment information be used to identify an eleven-digit zip code, and that the identified zip code be used to access or retrieve a payee record, the Examiner relies on Pintsov (column 7, lines 49-52, column 10, lines 54-55, and column 12, lines 23-32) as disclosing the processing of payment information to identify a zip code. The Examiner also takes Official Notice that accessing a database to locate payee information corresponding to the eleven-digit zip code is old and well known in the art.

With respect to claims 11, 28-30, 40 and 48, which require identifying characters of an account number or processing a received account number to select or identify a single delivery point to which payment is directed, the Examiner relies on Pintsov (column 11, lines 39-51) as describing the use of a zip

code to identify a single delivery point to which delivery is directed.

Regarding claims 13-15, 31, 39 and 49, which require transforming the account number included in a payment request into an altered account number according to the alteration rules and/or validating a received or altered account number according to validation rules, the Examiner relies on Pintsov (column 10, lines 61-65, column 11, lines 56-67 and column 12, lines 1-4) as disclosing the recited features.

#### **IX. GROUPING OF CLAIMS**

The various claimed embodiments of the invention are defined within groupings of claims (i) 1-7, 11, and 13-15, (ii) 19-31, (iii) 35-40, (iv) 41-49, and 50. However, the claims of each group do not stand or fall together. Claims 1-3, 7, 11, 13-15, 19, 21, 25-31, 35-43, and 47-50 each require features which form an independent basis for allowance.

#### **X. ARGUMENT**

Appellants respectfully traverse the rejections based on the prior art combination applied against the claims now pending on appeal. As discussed below, it is respectfully submitted that the Examiner has not met the burden of proof in establishing that the appealed claims are obvious, has failed to provide the required factual basis and reasonable rational for the rejections, and has failed to apply art which teaches or suggest the invention as claimed.

1. THE EXAMINER HAS FAILED TO ESTABLISH A PRIMA FACIE CASE

The initial burden of establishing a basis for denying patentability to a claimed invention rests upon the examiner. In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Thorpe, 777 F.2d 695, 227 USPQ 964 (Fed. Cir. 1985); In re Piasecki, 745 F.2d 1468, 223 USPQ 785 (Fed. Cir. 1984).

The Examiner must provide sufficient factual basis or rationale as to how features of the invention recited in the claims are taught or suggested in the applied art. Uniroyal, Inc. v. Rudkin-Wiley Corp., 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988). The limitations required by the claims cannot be ignored. See In re Wilson, 424 F.2d 1382, 165 USPQ 494 (CCPA 1970). No claim limitation, including one which is functional, can be ignored. See In re Oelrich, 666 F.2d 578, 212 USPQ 323 (CCPA 1981). All words in a claim must be considered in deciding the patentability of that claim against the prior art. Each word in a claim must be given its proper meaning, as construed by a person skilled in the art. Where required to determine the scope of a recited term, the disclosure may be used. See In re Barr, 444 F.2d 588, 170 USPQ 330 (CCPA 1971).

Each of independent claims 1, 19, 41 and 50 require the receipt of respective sets of payment requests from a plurality of sources or separate or independent sources, each set of requests corresponding to an associated set of payors. Independent claim 35 requires the receipt of respective sets of payment requests from a plurality of source stations, which in

turn received respective of the payment requests from a plurality of payors.

As discussed above, in the Final Official Action, the Examiner argues that Kight discloses the above features, in column 2, lines 38-53. In the Advisory Action dated May 12, 2000, in answer to the Request for Reconsideration filed on April 25, 2000, the Examiner further argues the such features are disclosed by Kight in column 4, lines 42-52.

However, as also discussed above, Kight only discloses receiving payment requests directly from each payor. That is, payment requests from each individual payor are in all cases received separately from the payment requests of the other payors. Hence, the Examiner's position is inconsistent generally with the teachings of Kight. Further, in the referenced text in column 2, lines 38-53, Kight discloses a process for initiating service in which a payor provides the necessary sign-up information for that payor directly to the service provider. There is nothing in the referenced text to suggest that the sign-up information is provided as part of a set of information relating a plurality of payors. In fact, there is nothing in the referenced text which relates to receipt of a payment request, let alone one which is received as part of a set of payment requests including payment requests of other payors.

The referenced text in column 4, lines 42-52 does relate to the processing of a payment request. However, there is nothing in the reference text which suggests how the payment records are received. Rather, to be properly understood, the referenced text

must be read in context. The proceeding paragraphs, beginning in column 4, line 3, and Figure 1, make clear that the payment requests from each payor are received independent of payment requests from each other payor. Hence, there are not respective sets of payment requests, each set corresponding to an associated of set of payors. Nor are there a plurality of sources from which to receive such sets of payment requests. Furthermore, Kight does not disclose respective sets of payment requests being received from a plurality of source stations, which in turn received respective of the payment requests within the sets from a plurality of payors.

In the Final Official Action, the Examiner relies on Pintsov (column 7, lines 49-56) as disclosing the generation of payment directions for paying a plurality of payees, as recited in each of independent claims 1, 19, 35, 41 and 50 and hence required by all claims of the subject application.

However, Pintsov generally relates to mail processing which assigns a delivery destination code based on a unique identifier. The referenced section of the Pintsov disclosure relates to altering a stored zip code due to an address change and has nothing whatsoever to do with generating payment directions for paying payees in accordance with processed payment requests.

More particularly, Pintsov is directed to a mail system for securely protecting the payment to the carrier service by insuring that the carrier service authorizes mail prior to its actual deposit into the postal stream. As described in column 12, line 51, through column 13, line 30, and shown in Figures 6

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and 10, each mail piece is marked with a mail piece ID 306 other than the zip code, which is used in the authorization process. The unique mail piece ID is used to access the correct mailing identification file to retrieve the extended zip code. The zip code is then printed on the mail piece as indicated by 1002. Nowhere does Pintsov disclose generating payment directions for paying a plurality of payees in accordance with processed sets of payment requests.

Claims 2, 3, 21, and 42-43 require that received sets of payment requests formatted in a particular format be normalized to a different format.

As discussed above, the Examiner relies on Kight description in (Col. 3, line 39) as corresponding to the recited limitations. However, Kight's disclosure in referenced text relates to ensuring that payments to payees are in a proper format, and has nothing to do with payment requests from payors, let alone normalizing such payment requests.

Claims 7-10, 25-27, 36-38 and 47, require that payment information be used to identify an eleven-digit zip code, and that the identified zip code be used to access or retrieve a payee record.

As discussed above, the Examiner relies on Pintsov (column 7, lines 49-52, column 10, lines 54-55, and column 12, lines 23-32) as disclosing the processing of payment information to identify a zip code. The Examiner also takes Official Notice that accessing a database to locate payee information corresponding to the eleven-digit zip code is old and well known



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in the art.

However, to the extent Pintsov discloses processing payment information in the referenced text, it has nothing whatsoever to do with identifying a zip code. Rather, what the Examiner construes as payment information is processed only to debit the mailer's account. At best this relates to generating a payment request. The discussion of the mailing ID file in the referenced text in column 10 is unrelated to the processing of what the Examiner construes as payment information, except to the extent that the file is only sent to the mailer after the debiting of the mailer's account. Furthermore, there is no identifying of a zip code based on the relied upon processing.

In the referenced text, Pintsov also discloses altering the stored zip code due to an address change. However, here again the received information is not used to identify an eleven-digit zip code, which is in turn used to access or retrieve a payee record. Rather, Pintsov describes using a unique ID other than the zip code (see for example Figure 6 and column 12, line 51, through column 13, line 15) to access a stored payee record to obtain a zip code and prints the zip code on a piece of mail. The unique ID is also, when appropriate, used to access a stored payee change of address record to obtain a changed zip code, which is substituted for the original zip code in the stored payee record.

The relevance of the Official Notice taken by the Examiner is not understood. The Examiner asserts that it is old and well known to access a database to locate payee information corresponding to the eleven-digit zip code. However, even if

this were true, which is not conceded, the claims do not simply recite using a zip code for accessing a database to locate payee information corresponding to the zip code. Rather, the claims require using a zip code, which is identified by processing other received information, to locate or retrieve a file or record which has an associated corresponding zip code.

Claims 11, 28-30, 40 and 48, require identifying characters of an account number or processing a received account number to select or identify a single delivery point to which payment is directed.

As noted above, the Examiner asserts that Pintsov (column 11, lines 39-51) describes the use of a zip code to identify a single delivery point to which delivery is directed.

However, the relevance of the referenced disclosure is not understood, since the claims require that the payment delivery point be identified or selected based on account number information, not zip code information. Even if the Examiner is correct in now arguing that Pintsov's unique ID corresponds to an account number (which is not conceded) and that the unique ID is used to identify a delivery point (i.e. a zip code), Pintsov still lacks, and the Examiner has not identified within the combined art, any disclosure of using an account number to identify or select one of a plurality of different delivery points for directing payment.

Claims 13-15, 31, 39 and 49, require transforming the account number included in a payment request into an altered account number according to the alteration rules and/or

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validating a received or altered account number according to validation rules.

As discussed above, the Examiner contends that Pintsov (column 10, lines 61-65, column 11, lines 56-67 and column 12, lines 1-4) discloses the recited features.

The Examiner's rationale is not understandable, since Pintsov, generally, and particularly in the referenced text, lacks any disclosure of altering an account number. What Pintsov does disclose in the referenced text is altering a zip code (not an account number) due to an address change. Further, the Examiner's reference to column 10, also does not support the Examiner's position, since this text does not describe any alteration of the unique ID, and hence of an account number if the unique ID were to be deemed to correspond to the recited account number. Furthermore, there is nothing in Pintsov to suggest that a received unique ID is somehow processed and altered. It is also unclear why the Examiner considers the fact that ID's will be different for different mailers relevant.

With respect to the required validation of the account number, the Examiner has not identified any disclosure within the applied prior art combination in support of the rejection. Accordingly, it can only be concluded that these limitations have been completely ignored.

MPEP §706.07 clearly requires that "before final rejection is in order a clear issue should be developed between the Examiner and applicant." Indeed, the Manual states that "the references should be fully applied" (emphasis added), so as to

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deal justly with the applicant as well as the public. The Manual goes on to state that "present practice does not sanction hasty and ill-considered final rejections". "The applicant who is seeking to define his or her invention in claims that will give him or her the patent protection to which he or she is justly entitled should receive the cooperation of the examiner to that end." "The examiner should never lose sight of the fact that in every case the applicant is entitled to a full and fair hearing, and that a clear issue between applicant and examiner should be developed, if possible, before appeal."

In the present instance, pending claims 1-7, 11, 13-15, 19-31 and 35-50 were rejected over prior art without consideration of numerous claimed features, on the basis of a reading of the prior art which is inconsistent with the art's own teachings, and without a clear explanation of the rationale for the rejection. Notwithstanding the Applicant's attempts to obtain an understanding of the basis for the rejection, the rejection of the claims over the prior art has been maintained, as indicated in the Advisory Action referred to above in contradiction of MPEP 706.07.

Hence, it is apparent that the Examiner has failed to comply with the requirements of MPEP 706.07 and has not established a prima facie basis for the rejection of the claims 1-7, 11, 13-15, 19-31 and 35-50 in the Final Official Action.

2. THE APPLIED REFERENCES FAIL TO TEACH OR SUGGEST THE CLAIMED INVENTION

In rejecting claims under 35 U.S.C. 103, it is incumbent upon the Examiner to establish a factual basis to support the legal conclusion of obviousness. Stratoflex, Inc. v. Aeroquip Corp., 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983); In re Warner, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967). It also is incumbent upon the Examiner to provide a basis in fact and/or cogent technical reasoning to support the conclusion that one having ordinary skill in the art would have been motivated to combine references to arrive at a claimed invention. Uniroyal, Inc. v. Rudkin-Wiley Corp., 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988). In so doing, the Examiner is required to make the factual determinations set forth in Graham v. John Deere Co. of Kansas City, 383 U.S. 1, 148 USPQ 459 (1966), and to provide a reason why one having ordinary skill in the art would have been led to modify the prior art reference to arrive at the claimed invention. Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.2d 281, 227 USPQ 657 (Fed. Cir. 1985). Such a reason must stem from some teaching, suggestion or inference in the prior art as a whole or knowledge generally available to one having ordinary skill in the art. Uniroyal, Inc. v. Rudkin-Wiley, 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988); Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.d 281, 227 USPQ 657 (Fed. Cir. 1985); ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 221 USPQ 929 (Fed. Cir. 1984); In re Sernaker, 702 F.2d 989, 217 USPQ 1 (Fed. Cir. 1983). Inherency requires certainty, not speculation. In re

Rijckaert, 9 F.3rd 1531, 28 USPQ2d 1955 (Fed. Cir. 1993); In re King, 801 F.2d 1324, 231 USPQ 136 (Fed. Cir. 1986); W. L. Gore & Associates, Inc. v. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983); In re Oelrich, 666 F.2d 578, 212 USPQ 323 (CCPA 1981); In re Wilding, 535 F.2d 631, 190 USPQ 59 (CCPA 1976). Objective evidence must be relied upon to defeat the patentability of the claimed invention. Ex parte Natale, 11 USPQ2d 1222 (BPAI 1988).

In determining obviousness, the inquiry is not whether each element existed in the prior art, but whether the prior art made obvious the invention as a whole for which patentability is claimed. Hartness Int'l, Inc. v. Simplimatic Eng'g Co., 819 F.2d 1100, 2 USPQ2d 1826 (Fed. Cir. 1987). It is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. In re Wesslau, 353 F.2d 238, 147 USPQ 391 (CCPA 1951). Piecemeal reconstruction of prior art patents is improper, In re Kamm, 452 F.2d 1052, 172 USPQ 298 (CCPA 1972). The Examiner must give adequate consideration to the particular problems and solution addressed by the claimed invention. Northern Telecom, Inc. v. Datapoint Corp., 908 F.2d 931, 15 USPQ2d 1321 (Fed. Cir. 1990); In re Rothermel, 276 F.2d 393, 125 USPQ 328 (CCPA 1960).

The test is what the combined teachings would have suggested to those of ordinary skill in the art. In re Keller, 642 F.2d 413, 208 USPQ 817 (CCPA 1981). Simplicity and hindsight are not

proper criteria for resolving obviousness, In re Warner, supra. The proper approach to the issue of obviousness is whether the hypothetical person of ordinary skill in the art, familiar with the references, would have found it obvious to make a structure corresponding to what is claimed. In re Keller, 642 F.2d 413, 208 USPQ 871 (CCPA 1981); In re Sernaker, 702 F.2d 989, 217 USPQ 1 (Fed. Cir. 1983). Hindsight obviousness after the invention has been made is not the test. In re Carroll, 601 F.2d 1184, 202 USPQ 571 (CCPA 1979). The reference, viewed by itself and not in retrospect, must suggest doing what applicant has done. In re Shaffer, 229 F.2d 476, 108 USPQ 326 (CCPA 1956); In re Skoll, 523 F.2d 1392, 187 USPQ 481 (CCPA 1975).

The issue is not whether it is within the skill of the artisan to make the proposed modification but, rather, whether a person of ordinary skill in the art, upon consideration of the references, would have found it obvious to do so. The fact that the prior art could be modified so as to result in the combination defined by the claims would not have made the modification obvious unless the prior art suggests the desirability of the modification. See In re Gordon, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984), In re Deminski, 796 F.2d 436, 230 USPQ 313 (Fed. Cir. 1986), In re Keller, supra. See In re Laskowski, F.2d., 10 USPQ2d 1397 (CAFC 1989).

Each of independent claims 1, 19, 41 and 50 require the receipt of respective sets of payment requests from a plurality of sources or separate or independent sources, each set of requests corresponding to an associated set of payors.

Independent claim 35 requires the receipt of respective sets of payment requests from a plurality of source stations, which in turn received respective of the payment requests from a plurality of payors.

As discussed above, in the Final Official Action, the Examiner argues that Kight discloses these features, in column 2, lines 38-53. In the Advisory Action dated May 12, 2000, in answer to the Request for Reconsideration filed on April 25, 2000, the Examiner further argues the such features are disclosed by Kight in column 4, lines 42-52.

However, as also discussed above, Kight only discloses receiving payment requests directly from each payor. That is, payment requests from each individual payor are in all cases received separately from the payment requests from the other payors.

More particularly, in column 2, lines 38-53, Kight discloses a process for initiating service and does not in any way suggest that this process includes the receipt of a payment requests. However, even if it did (which it does not) the information being discussed therein is received directly from the applicable payor and separate from similar information received from each other payor.

The referenced text in column 4, lines 42-52 does relate to the processing of a payment request. However, there is nothing in this text which addresses how the payment records are received. Rather, receipt of payment requests are described in the proceeding paragraphs, beginning in column 4, line 3, and



shown in Figure 1. This disclosure of Kight makes clear that the payment requests from each payor are received independent of payment requests from each other payor. Pintsov, which is discussed further below, has not been applied in this regard and also lacks any suggestion of the receipt of sets of payment requests as required by each of the independent claims.

Hence, it is respectfully submitted that the applied art combination fails to teach or suggest the receipt of respective sets of payment requests as required by claims 1, 19, 35, 41 and 50. Furthermore, the applied combination of art also lacks any teaching or suggestion of the plurality of sources from which to receive such sets of payment requests as recited in each of the independent claims. Further still, the applied art combination additionally fails to disclose source stations which receive respective of the payment requests from a plurality of payors, and a centralized station which receives respective sets of these payment requests from the source stations as required by independent claim 35.

Although the Examiner points to Pintsov (column 7, lines 49-56) as disclosing the generating payment directions for paying a plurality of payees in accordance with a processed payment request, it is respectfully submitted that the relied upon disclosure relates to altering a stored zip code due to an address change and has nothing whatsoever to do with generating payment directions for paying payees in accordance with the processed payment requests. Kight, however, does generally disclose that a received payment request can be processed to

generate a payment directive.

Claims 2, 3, 21, and 42-43 require that a received set of payment requests, formatted in a particular format, be normalized to a different format.

The Examiner relies on Kight's description in column 3, line 39, as disclosing the recited limitations.

However, Kight's disclosure in referenced text relates to ensuring that payments to payees are in a proper format, and has nothing to do with payment requests from payors, let alone normalizing such payment requests. Pintsov, has not been applied in this regard and also lacks any suggestion of normalizing a set of payment requests as required.

Hence, it is respectfully submitted that the applied art combination fails to teach or suggest the normalizing required by claims 2, 3, 21, and 42-43

Claims 7-10, 25-27, 36-38 and 47, require that payment information be used to identify an eleven-digit zip code, and that the identified zip code be used to access or retrieve a payee record.

As discussed above, the Examiner relies on Pintsov (column 7, lines 49-52, column 10, lines 54-55, and column 12, lines 23-32) as disclosing the processing of payment information to identify a zip code. The Examiner also takes Official Notice that accessing a database to locate payee information corresponding to the eleven-digit zip code is old and well known in the art.

Pintsov is directed to a mail system for securely protecting

the payment to the carrier service by insuring that the carrier service authorizes mail prior to its actual deposit into the postal stream. As described in column 12, line 51, through column 13, line 30, and shown in Figures 6 and 10, Each mail piece is marked with a mail piece ID 306 other than the zip code, which is used in the authorization process. The unique mail piece ID is used to access the correct mailing identification file to retrieve the extended zip code. The zip code is then printed on the mail piece as indicated by 1002.

To the extent Pintsov discloses processing payment information in the referenced text, it has nothing whatsoever to do with identifying a zip code. The information is processed in order to debit the mailer's account, and not identify a zip code, and this information is different than the information being referred to in the discussion of the mailing ID file in the referenced text in column 10.

Pintsov does disclose altering the stored zip code due to an address change, but the received information which is processed in this regard is not used to identify an eleven-digit zip code, which is in turn used to access or retrieve a payee record. Rather, Pintsov describes using a unique ID other than the zip code (see for example Figure 6 and column 12, line 51, through column 13, line 15) to access a stored payee record to obtain a zip code and prints the zip code on a piece of mail. The unique ID is also, when appropriate, used to access a stored payee change of address record to obtain a changed zip code, which is substituted for the original zip code in the stored payee record.

To the extent accessing a database to locate payee information corresponding to the eleven-digit zip code is known, as Officially Noticed by the Examiner but not conceded herein, it still does not cure the defects in the combination of references, since the claims require more than using a zip code to access a database to locate payee information corresponding to the zip code. In fact, the Examiner has not identified any disclosure within the applied art as suggesting the required use of a zip code, which is identified by processing other received information, to locate or retrieve a file or record which has an associated corresponding zip code. Kight has not been applied in this regard and also lacks any suggestion of payment information being utilized to identify an eleven-digit zip code, which is in turn used to access or retrieve a payee record.

Hence, it is respectfully submitted that the applied art combination fails to teach or suggest the identifying of an eleven-digit zip code, and the accessing or retrieving of a payee record with the identified zip code as required by claims 7-10, 25-27, 36-38 and 47.

Claims 11, 28-30, 40 and 48, require identifying characters of an account number or processing a received account number, to select or identify a single delivery point to which payment is directed.

As noted above, the Examiner asserts that Pintsov (column 11, lines 39-51) describes the use of a zip code to identify a single delivery point to which delivery is directed.

Even if Pintsov's unique ID were viewed as corresponding to

an account number (which is not conceded) and used to identify a delivery point based upon its use in identifying a zip code, the Examiner has not identified any disclosure within the combined art, and the applied combination of art lacks any disclosure, teaching or suggesting that an account number be used to identify or select one of a plurality of different delivery points to which payment can be directed.

Hence, it is respectfully submitted that the applied art combination fails to teach or suggest the use of an account number as required by claims 11, 28-30, 40 and 48.

Claims 13-15, 31, 39 and 49, require transforming the account number included in a payment request into an altered account number according to the alteration rules and/or validating a received or altered account number according to validation rules.

As discussed above, the Examiner contends that Pintsov (column 10, lines 61-65, column 11, lines 56-67 and column 12, lines 1-4) discloses the recited features.

However, Pintsov lacks any disclosure of altering an account number. What Pintsov does disclose in the referenced text is altering a zip code (not an account number) due to an address change. The reference in column 10 does not describe any alteration of the unique ID. Furthermore, there is nothing in Pintsov to suggest that a received unique ID is somehow processed and altered. The fact that the ID's will be different for different mailers is irrelevant. The Examiner has not identified anything within the applied prior art combination in

support of the rejection relating to the required validation features. Accordingly, it can only be concluded that these limitations have been completely ignored.

Hence, it is respectfully submitted that the applied art combination fails to teach or suggest the invention as recited in claims 13-15, 31, 39 and 49.

3. THE EXAMINER HAS NOT REASONABLY CONSIDERED WHAT IS DISCLOSED BY THE APPLIED REFERENCE, HAS IGNORED CLAIM LIMITATIONS AND HAS REJECTED THE CLAIMS BASED ON AN IMPROPER HINDSIGHT RECONSTRUCTION OF THE CLAIMED INVENTION

In rejecting claims, it is incumbent upon the Examiner to establish a factual basis to support the legal conclusion of obviousness. Stratoflex, Inc. v. Aeroquip Corp., 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983); In re Warner, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967). The Examiner is required to make the factual determinations (see e.g. Graham v. John Deere Co. of Kansas City, 383 U.S. 1, 148 USPQ 459 (1966)), and to provide a reason for the rejection (see e.g. Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.2d 281, 227 USPQ 657 (Fed. Cir. 1985). Such a reason must stem from some teaching or inference in the prior art as a whole or knowledge generally available to one having ordinary skill in the art. Uniroyal, Inc. v. Rudkin-Wiley, 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988); Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.d 281, 227 USPQ 657 (Fed. Cir. 1985); ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 221 USPQ 929 (Fed. Cir. 1984); In re

Sernaker, 702 F.2d 989, 217 USPQ 1 (Fed. Cir. 1983). Inherency requires certainty, not speculation. In re Rijckaert, 9 F.3d 1531, 28 USPQ2d 1955 (Fed. Cir. 1993); In re King, 801 F.2d 1324, 231 USPQ 136 (Fed. Cir. 1986); W. L. Gore & Associates, Inc. v. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983); In re Oelrich, 666 F.2d 578, 212 USPQ 323 (CCPA 1981); In re Wilding, 535 F.2d 631, 190 USPQ 59 (CCPA 1976). Objective evidence must be relied upon to defeat the patentability of the claimed invention. Ex parte Natale, 11 USPQ2d 1222 (BPAI 1988).

It is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. In re Wesslau, 353 F.2d 238, 147 USPQ 391 (CCPA 1951). Piecemeal reconstruction of prior art patents is improper, In re Kamm, 452 F.2d 1052, 172 USPQ 298 (CCPA 1972). The Examiner must give adequate consideration to the particular problems and solution addressed by the claimed invention. Northern Telecom, Inc. v. Datapoint Corp., 908 F.2d 931, 15 USPQ2d 1321 (Fed. Cir. 1990); In re Rothermel, 276 F.2d 393, 125 USPQ 328 (CCPA 1960).

Simplicity and hindsight are not proper criteria for resolving obviousness, In re Warner, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967). Hindsight after the invention has been made is not the test. In re Carroll, 601 F.2d 1184, 202 USPQ 571 (CCPA 1979). The reference, viewed by itself and not in retrospect, must disclose doing what applicant has done. In re Shaffer, 229 F.2d 476, 108 USPQ 326 (CCPA 1956); In re Skoll, 523 F.2d 1392, 187 USPQ

481 (CCPA 1975).

As discussed above, it is respectfully submitted that the Examiner has rejected the claims without consideration of recited features, without reasonably considering what is taught and suggested by the applied reference, and at best based on an improper hindsight reconstruction of the claimed invention.

### **CONCLUSION**

It is respectfully submitted that the Examiner has (i) failed to establish a prima facie case for the rejection, (ii) ignored features explicitly required by the claims, (iii) failed to reasonably construe that which is taught and suggested by the applied prior art combination, (iv) used improper hindsight to reconstruct the invention recited in the rejected claims, (v) failed to apply art which teaches or suggests the claimed invention, and (vi) has applied art in a manner inconsistent with its teachings.

Thus, it is respectfully submitted that the rejection of claims 1-7, 11, 13-15, 19-31 and 35-50 as obvious under 35 U.S.C. §103(a) over the applied prior art combination is improper.

In summary, Applicants respectfully submit that the applied combination of references does not teach or suggest features recited in rejected independent claims 1, 19, 35, 41 and 50, upon which all other pending claims depend. It is further respectfully submitted that the applied references also fail to disclose numerous other features recited in the pending dependent claims. Accordingly, it is submitted that the applied art combination does



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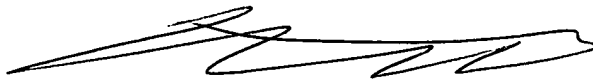
not provide any teaching, or suggestion within its teachings, which would lead to the features (or advantages) of the instant invention, and the claims patentably define over the art.

The rejection of claims 1-7, 11, 13-15, 19-31 and 35-50 under 35 U.S.C. §103(a) is in error and reversal is clearly in order and is courteously solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 12-0429 and please credit any excess fees to such deposit account.

Respectfully submitted,

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APPENDIX

1. A method for electronically processing bill payment requests, comprising the steps of:

receiving respective sets of payment requests electronically from a plurality of independent sources, each set of payment requests corresponding to an associated set of payors requesting payments to a plurality of payees; and

processing the payment requests at a single remittance processing system having a database including payee information for each of the plurality of payees to generate payment directions for paying the plurality of payees in accordance with the processed payment requests.

2. The method of claim 1, wherein:

a first of the respective sets of payment requests is received in a first format;

a second of the respective sets of payment requests is received in a second format, different from the first format; and

processing includes normalizing the first and the second respective payment requests to correspond to a third format and generating the payment directions based upon the normalized first and second respective payment requests.

3. The method of claim 1, wherein:

a first of the respective sets of payment requests is received in a first format; and

processing includes normalizing the first respective payment requests to correspond to a normalized format and generating the payment directions based upon the normalized first respective payment requests.

4. The method of claim 1, wherein each of the respective sets of payment requests from payors is received as a batch file.

5. The method of claim 1, further comprising the step of:  
performing one of electronically crediting a bank account of the payee and generating a check or draft payable to the payee in accordance with the payment directions.

6. The method of claim 1, further comprising the steps of:  
generating a respective payment advice for each of the plurality of payees in accordance with the payment directions;  
and

electronically transmitting the payment advice to each of the plurality of payees.

7. The method of claim 1, wherein each of the received payment requests includes payor payment information including at least one of a name, a street address, a city and state, and a first zip code of the payee to be paid, and further comprises the steps of:

processing at least a portion of the payor payment information other than any received first zip code, to identify

an eleven digit zip code for the payee to be paid; and

accessing the database to locate the payee information corresponding to the eleven digit zip code.

11. The method of claim 1, wherein a first of the plurality of payees has a plurality of payment remittance centers and a first of the payment requests includes information identifying a payor account number with the first payee, and further comprising the steps of:

identifying one or more alphanumeric characters in the account number;

selecting one of the plurality of remittance centers based upon the identified alphanumeric characters; and

directing payment to the one remittance center.

13. The method of claim 1, wherein each of the payment requests includes a payor's account number with a payee, and further comprising the steps of:

storing alteration rules corresponding to a payee account number format; and

transforming the account number included in one of the payment requests into an altered account number including a portion of at least one of a payor's name, a payor's street address and a payor's zip code according to the alteration rules.

14. The method of claim 13, further comprising the step of:

transmitting the altered account number to the payee to

notify a payee of a payment based on the payment directions.

15. The method of claim 13, further comprising a step of:

storing validation rules corresponding to payee values for fields of the account number; and

determining if the received account number conforms with the validation rules.

19. An electronic bill payment system for processing payment requests, comprising:

an input port for receiving respective sets of payor payment requests from a plurality of separate sources, each of the sets of payment requests corresponding to an associated set of payors;

a data base configured to store records associated with a plurality of payees; and

a processor for processing the respective sets of payor payment requests to generate payment directions for paying the plurality of payees in accordance with the received payment requests and the records stored in the database associated with the plurality of payees.

20. (Amended) The system of claim 19, wherein the input port receives a respective batch file from each of the plurality of sources, each respective batch file containing a different one of the sets of payment requests.

21. The system of claim 19, wherein:

the payment requests from each of the plurality of separate sources are in a different format from that of the payment requests from other of the plurality of separate sources; and

the processor is further configured to normalize the payment requests from each source to correspond to a common format prior to producing the payment directions.

22. The system of claim 19, further comprising:

a merchant payment unit for paying the payees based on the payment directions by performing one of electronically crediting an account of the payee with a financial institution and generating a check or draft payable to the payee.

23. The system of claim 19, wherein the processor generates payment advice to the plurality of payees corresponding to the payment directions.

24. The system of claim 23, wherein the payment advice is in a form electronically readable by a payee system.

25. The system of claim 19, wherein each of the payment requests includes payment information; and

the processor is further configured to process the payment information, excluding zip code information, to produce an eleven digit zip code associated with the payee.

26. The system of claim 25, wherein the processor is further

configured to retrieve the records corresponding to the eleven digit zip code from the database.

27. The system of claim 25, wherein the processor is further configured to direct a payment to the payee in accordance with the payment directions.

28. The system of claim 19, wherein:

one of the payor payment requests is a request to pay one of the plurality of payees having a plurality of payment remittance centers, the one payor payment request includes a payor account number with the one payee; and

the processor is further configured to process the account number to identify one of the plurality of payment remittance centers, and to generate the payment directions to direct payment to the one payment remittance center.

29. The system of claim 28, wherein the processor is further configured to identify information in the account number which corresponds to the one payment remittance center and to identify the one payment remittance center based upon the identified information.

30. The system of claim 29, wherein the identified information includes one or more alphanumeric characters.

31. The system of claim 19, further comprising:

a storage device configured to store validation rules corresponding to values for fields of payee account numbers and alteration rules corresponding to a payee account number format;

wherein the payment requests include payor account numbers;

wherein the processor is further configured to verify that the account numbers conform to the stored validation rules, alter the account numbers according to the stored alteration rules, and generate the payment directions to include the altered account number;

wherein the altered account number includes a portion of at least one of the payor's name, street address or zip code.

35. A system for processing payment information, comprising:

one or more networks;

a plurality of source stations, coupled to the one or more networks, each source station configured to collect respective payment requests from a plurality of payors for payment of a plurality of payees, each request containing payment information, including a payee name, payee address data, and a payor account number with a payee; and

a centralized remittance station, coupled to the one or more networks, and configured to receive the respective sets of payment requests from the plurality of source stations via at least one of the one or more networks, and process the payment information to generate payment directions for paying the plurality of payees in accordance with the processed payment information.



36. The system of claim 35, wherein:

the centralized remittance station is further configured to process the payment information to produce an eleven digit zip code for each of the payees, access a database to locate a payee record corresponding to the eleven digit zip code and generate the payment directions for paying that payee in accordance with the located payee record.

37. The system of claim 36, wherein:

the database is accessed using a portion of the name of each payee and the eleven digit zip code for that payee to access the payee record of that payee.

38. The system of claim 37, wherein:

the centralized remittance station matches the portion of the payee name with a payee name in the payee record to locate the payee record.

39. The system of claim 35, further comprising:

a database of alteration rules indicating a format for payee account numbers;

wherein the centralized remittance station transforms the payor account number into an altered payor account number according to the alteration rules and generates payment directions including the altered payor account number.

40. The system of claim 35, wherein the payee has a plurality of remittance centers and the centralized remittance station is further configured to process the payor account number to identify one of the plurality of remittance centers, and to generate the payment direction so as to direct payment to the single remittance center.

41. An article of manufacture for electronically processing bill payment requests, the article of manufacture comprising:

a computer readable medium; and

computer programming stored on the medium; wherein the stored computer programming is configured to be readable from the computer readable medium by at least one computer to thereby cause the at least one computer to operate so as to:

receive respective sets of payment requests electronically from a plurality of independent sources, each set of payment requests corresponding to an associated set of payors requesting payments to a plurality of payees, and

process the payment requests at a single remittance processing system having a database including payee information for each of the plurality of payees to generate payment directions for paying the plurality of payees in accordance with the processed payment requests and the payee information.

42. The article of manufacture according to claim 41, wherein the computer programming is further readable to cause the least one computer to:

receive a first of the respective sets of payment requests in a first format;

receive a second of the respective sets of payment requests in a second format, different from the first format; and

normalize the first and the second respective sets of payment requests to correspond to a third format; and

generate the payment directions based upon the normalized first and second respective sets of payment requests.

43. The article of manufacture according to claim 41, wherein:

a first of the respective sets of payment requests is received in a first format; and

processing includes normalizing the first respective set of payment requests to correspond to a normalized format and generating the payment directions based upon the normalized first respective payment requests.

44. The article of manufacture according to claim 41, wherein each of the respective sets of payment requests from payors is received as a batch file.

45. The article of manufacture according to claim 41, wherein:

the payment directions direct one of electronically crediting a bank account of the payee and generating a check or draft payable to the payee.

46. The article of manufacture according to claim 41, wherein

the computer programming is further readable to cause the at least one computer to:

generate a respective payment advice for each of the plurality of payees corresponding to the payment directions; and  
transmit the payment advice to each of the plurality of payees.

47. The article of manufacture according to claim 41, wherein:

each of the received payment requests includes payor payment information having at least one of a name, a street address, and a city and state of the payee to be paid;

the computer programming is further readable to cause the at least one computer to process at least a portion of the payor payment information other than a received zip code to identify an eleven digit zip code for the payee to be paid, and to access the database to locate the payee information corresponding to the eleven digit zip code.

48. The article of manufacture according to claim 41, wherein:

a first of the plurality of payees has a plurality of payment remittance centers and a first of the payment requests includes information identifying a payor account number with the first payee; and

the computer programming is further readable to cause the at least one computer to:

identify one or more alphanumeric characters in the account number,

select one of the plurality of remittance centers based upon the identified alphanumeric characters, and  
direct payment to the one remittance center.

49. The article of manufacture according to claim 41, wherein:  
each of the payment requests includes a payor's account number with a payee; and

the computer programming is further readable to cause the at least one computer to:

determine if the received account number conforms with validation rules corresponding to payee values for fields of the account number;

transform the validated account number into an altered account number according to the alteration rules corresponding to a payee account number, and

transmit the altered account number to the payee to notify a payee of a payment based on the payment directions.

50. An electronic bill payment system for processing payment requests, comprising:

an input port for receiving sets of payor payment requests from a plurality of separate sources, each separate source associated with a respective set of payment requests from a plurality of payors for payment to a plurality of payees;

a data base configured to store records associated with the plurality of payees; and

a processor for processing the payment requests to generate

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payment directions for paying the plurality of payees in accordance with the received payment requests and the records stored in the database associated with the plurality of payees.